

## REMARKS

Reconsideration of the present application in view of the above amendments and the following remarks is respectfully requested.

### I. Status of the Claims

Claims 1-5 is currently pending in the present application. In the Office Action Summary dated February 4, 2003, Claims 1-5 were rejected under 35 U.S.C. §103(a) as being unpatentable over Belec et al, in view of Becher. No new matter has been added.

### II. Objections to the Specification

The Examiner objected to the lack of an Abstract for the specification. This amendment adds an Abstract as required. No new matter has been added.

### III. Rejections Under 35 U.S.C. § 103

The Examiner rejected claims 1-5 were rejected under 35 U.S.C. § 103 as being unpatentable over Belec in view of Becher. Applicants respectfully traverse these rejections because the rejected claims recite elements that are not taught or suggested by either of the asserted references.

In particular neither Belec nor Becher describe "the envelope-conveying arrangement" as being "oriented transversely to the push-in direction." As seen in Fig. 2 of Belec, envelopes 24 are supplied from below the deck in an orientation in line with the push in direction. The

arrangement in Belec, is also different in that stuffed envelopes are transported away along the same push-in direction, instead of transversely.

The Examiner acknowledged this deficiency at the top of page 4 of the February 4, 2003 Office Action. However, Applicants respectfully traverse the Examiner's contention that the use of the transverse orientation "involves only routine skill in the art." To the contrary, relative orientations of documents in an envelope-filling system often present significant challenges that require inventive creativity to overcome. Consistently getting enclosures starting from one remote location to successfully meet up with envelopes from another remote location, and making sure everything lines up properly, is a big challenge of which orientation is a significant part.

Belec shows how the problem of making the enclosures line up can be solved by having the document and envelopes travel in parallel paths, one below the other. While this arrangement may simplify alignment of the documents with the envelopes, there may be a problem in gaining access the lower of the parallel paths. The transverse arrangement allows greater accessibility, but a different challenge is presented to ensure that envelopes stop at the right place, and that the envelope transporting mechanism does not interfere with the filling process.

These missing claim elements relating to the transverse orientation are not cured in Becher. In Becher, there is not even any "push-in" direction, because there is no stuffing of envelopes taught by this reference. Becher discloses a franking machine used to seal and place a franking mark on a pre-prepared mail piece. Thus, Becher does not include any disclosure about relative arrangements of envelopes and enclosures to be pushed into the envelopes.

Another element missing from both Belec and Becher is that a "roller bar (10) equipped with spring mounted rollers (13) can be lowered onto the top side of the tops strand of the envelope-conveying belt (6), and raised from it in a controlled manner." As can be seen from claim 1, and the corresponding disclosure in the figures and specification, the spring mounted rollers are automatically lowered during the automated stuffing process to convey empty envelopes to the push-in station and to remove filled envelopes from the push-in station. During the actual push-in process, the rollers are automatically raised so as not to hinder pushing the documents into the envelopes. This automated raising and lowering feature is further recited in lines 30-34 of claim 1.

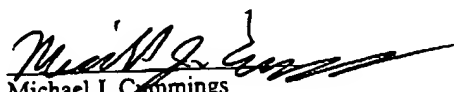
As noted by the Examiner, Belec does not include a roller bar, and instead Becher is relied upon. While Fig. 2 of Becher does show a movable upper set of rollers, such rollers are not automatically raised and lowered during any part of normal machine operation. From Fig. 2, it appears that the set of upper mounted rollers are merely hinged so that they can be swung out of the way in order to clear away a jammed mail piece, or for clearer access to other parts of the machine below. There is certainly no description or suggestion of raising and lowering the rollers in Becher to facilitate envelope filling, because envelope filling is not part of the Becher franking machine. During normal operation of the Becher device, the upper rollers remain in place as envelopes are transported through the franking machine.

Finally, neither Belec nor Becher include any description or disclosure of the "auxiliary conveying arrangement (14)" recited in claim 1. (See Fig. 1). The Examiner appears to have overlooked this feature in providing the analysis of Belec and Becher.

Because features recited in claim 1 are not disclosed or suggested in either the Belec or Becher references the rejection under § 103 should be withdrawn. For the same reasons, dependent claims 2-5 should be found allowable.

If the Examiner has any questions, he is urged to contact the undersigned attorney.

Respectfully submitted,



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